

Edwin Aiwanian (SBN 232943)  
edwin@calljustice.com  
Jacob Karczewski (SBN 268295)  
jacob@calljustice.com  
**LAWYERS for JUSTICE, PC**  
410 West Arden Avenue, Suite 203  
Glendale, California 91203  
Tel: (818) 265-1020 / Fax: (818) 265-1021

KEITH A. JACOBY, Bar No. 150233  
kjacoby@littler.com  
LITTLES MENDELSON P.C.  
2049 Century Park East  
5<sup>th</sup> Floor  
Los Angeles, California 90067  
Telephone: 310.553.0308

LINDA NGUYEN BOLLINGER, Bar No. 289515  
lbollinger@littler.com  
JACQUELINE MENENDEZ, Bar No. 330737  
jmenendez@littler.com  
LITTLER MENDELSON, P.C.  
50 West San Fernando Street, 7th Floor  
San Jose, CA 95113  
Telephone: 408.998.4150  
Facsimile: 408.288.5686

Attorneys for Defendant  
CIGNA HEALTH & LIFE INSURANCE  
COMPANY

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

JONATHAN SANTIAGO, individually,  
and on behalf of other members of the  
general public similarly situated;

Case No. 1:20-CV-01413-NONE-SKO

**Plaintiff,**

## **NOTICE OF SETTLEMENT**

CIGNA HEALTH & LIFE INSURANCE COMPANY, an unknown business entity; and DOES 1 through 100, inclusive.

**Defendant.**

## NOTICE OF SETTLEMENT

CASE NO. 1:20-CV-01413-NONE-SKO

1 **TO THE HONORABLE COURT AND ALL PARTIES IN THIS MATTER:**

2       **PLEASE TAKE NOTICE** that after further settlement communications with mediator Mark  
3 Rudy, Esq. a settlement in principle was reached by the parties in this action and the related  
4 consolidated class and PAGA actions pending in the Superior Court of the State of California for the  
5 County of Tulare, styled, “*Plaintiffs JONATHAN SANTIAGO and ADRIAN AVILA, on behalf of the*  
6 *State of California, as private attorney general, Plaintiffs, v. CIGNA HEALTH & LIFE INSURANCE*  
7 *COMPANY, a Corporation; and Does 1 through 50, Inclusive,*” Case No. VCU283599.  
8

9       IT IS HEREBY STIPULATED by and between Plaintiffs Adrian Avila and Jonathan Santiago  
10 and Defendant CIGNA Health and Life Insurance Company (“Defendant”), by and through their  
11 respective counsel, and subject to approval by this Court, that in order to avoid duplication of efforts  
12 by multiple courts and inconsistent rulings on the settlement, and in light of the fact that a related class  
13 action and PAGA action is pending outside of this Court, the Parties stipulate and agree to seek  
14 approval of the settlement in this action together with approval of the class action in the Tulare County  
15 Superior Court, and respectfully request that this matter is stayed in all respects pending final approval  
16 by the Tulare County Superior Court. In the event the settlement is approved, Plaintiffs shall report  
17 such approval to this Court and request a dismissal of this action. In the event the settlement is not  
18 approved, the Parties will so inform the Court and request a lifting of the stay.  
19  
20

21 Date: October 25, 2021

**LAWYERS for JUSTICE, PC**

23 By: /s/ Edwin Aiwanian  
24 Edwin Aiwanian  
25 Attorneys for Plaintiff  
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NOTICE OF SETTLEMENT

CASE NO. 1:20-CV-01413-NONE-SKO

1 Dated: October 25, 2021

LITTLER MENDELSON, P.C.

3 By: /s/ Linda N. Bollinger

4 KEITH A. JACOBY  
5 LINDA N. BOLLINGER  
6 JACQUELINE MENENDEZ  
7 Attorneys for Defendant  
8 CIGNA HEALTH & LIFE INSURANCE  
9 COMPANY

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